

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO**

FILED

DEC 16 2021

CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
CLEVELAND

TERPSEHORE MARAS,

Plaintiff,

vs.

MAYFIELD CITY SCHOOL DISTRICT  
BOARD OF EDUCATION, et al,

Defendants.

Case No: 1:21-CV-1711

Hon. Solomon Oliver, Jr., U.S.D.J.

**DECLARATION IN SUPPORT OF  
MOTION TO AMEND AND APPOINT  
COUNSEL**

I, TERPSEHORE MARAS, make the following Declaration, pursuant to 28 U.S.C. § 1746:

1. I am the plaintiff in this action and am familiar with the facts and circumstances set forth in this Affidavit. I am moving to amend my complaint and have this Court appoint counsel for me. I'm unable to afford legal counsel. I've also reached out to numerous counsel who believe in the merits of this case but have been unwilling to work on this matter on a pro bono basis. This is a testament to the fact that lawyers are afraid of going against the system. This case is a highly complex constitutional case which will require significant discovery and expert testimony – the exact sort of case that requires legal counsel.

2. I lack the means to adequately investigate, prepare, or present this case. The next steps in this case will likely be renewed motion practice, discovery and potential hearings involving cross examination. All these events will require seasoned legal counsel. This case will require the Court render a ruling **after** weighing evidence. In sifting through the evidence and determining whether Defendants' policies do harm, legal counsel will be of service to the Court. The Governor and other Defendants are not part of any evil conspiracy – they have just

fallen prey to ignoring the rapidly evolving science in the same manner that allowed builders to use asbestos in hospitals for years longer than it should have been used, allowed mothers to use Bayer “heroin hydrochloride” as a baby analgesic in the early 19<sup>th</sup> century, and allowed pregnant mothers around the world to smoke in the 1950’s and 1960’s. Legal counsel guiding the Court will be of great benefit.

3. It is respectfully requested that the Court enter an Order granting my request for a referral to counsel and allow me to amend my Amended Complaint to bring forward claims against the Governor that have always been related to this action. My prior writ action against the Governor was dismissed on November 24, 2021 without any opinion. In dismissing the writ action, the Ohio Supreme Court accepted the Governor’s argument that: “Plaintiff has an adequate remedy at law for the entire Complaint in the form of a declaratory judgment and prohibitory injunctions.” My Motion to Amend does exactly what the Governor requested before the Ohio Supreme Court. And, my brief filed in the Ohio Supreme Court shows why the claim against the Governor has merit. *See* attached Exhibit “A”.

4. My proposed Second Amended Complaint is attached as Exhibit “B”.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing statements are true and correct.

  
TERPSEHORE MARAS

Dated: December 16, 2021